

Audra J. Soloway, Esq.
Jaren Janghorbani, Esq. (pro hac vice)
Matthew D. Stachel, Esq. (pro hac vice)
Kristina A. Bunting, Esq. (pro hac vice)
**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**
1285 Avenue of the Americas
New York, New York 10019-6064
Tel: (212) 373-3289
Fax: (212) 492-0289
asoloway@paulweiss.com
jjanghorbani@paulweiss.com
mstachel@paulweiss.com
kbunting@paulweiss.com

Samuel I. Portnoy, Esq.
Michael V. Caracappa, Esq.
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102-5310
(973) 596-4500
sportnoy@gibbonslaw.com
mcaracappa@gibbonslaw.com

Counsel for Defendants Bernardo Hees, Anu Hariharan, Lynn Krominga, Glenn Lurie, Joseph A. Ferraro, and Izilda P. Martins, and Nominal Defendant Avis Budget Group, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PAULA DEANGELIS,

Plaintiff,

v.

BERNARDO HEES, JAGDEEP PAHWA,
ANU HARIHARAN, LYNN KROMINGA,
GLENN LURIE, KARTHIK SARMA,
JOSEPH A. FERRARO, IZILDA P.
MARTINS and SRS INVESTMENT
MANAGEMENT LLC,

Defendants,

AVIS BUDGET GROUP, INC.,

Nominal Defendant.

No. 2:24-cv-05687-JXN-JSA

Document Filed Electronically

**ORAL ARGUMENT
REQUESTED**

RETURN DATE: February
18, 2025

**NOTICE OF MOTION TO
DISMISS**

To: Lee Squitieri, Esq.
Squitieri & Fearon, LLP
305 Broadway, 7th Floor
New York, New York 10007
Tel: (212) 421-6492
Fax: (212) 421-6553
lee@sfclasslaw.com

Fletcher Moore, Esq.
Moore Law, PLLC
30 Wall Street, 8th Floor
New York, New York 10005
Tel: (212) 709-8245
Fax: (917) 634-3035
fletcher@fmoorelaw.com

PLEASE TAKE NOTICE that on February 18, 2025, or such other time and date as set by the Court, Defendants Bernardo Hees, Anu Hariharan, Lynn Krominga, Glenn Lurie, Joseph A. Ferraro, and Izilda P. Martins, and Nominal Defendant Avis Budget Group, Inc. (the “Defendants”), will move before the Honorable Julien Xavier Neals, Judge of the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order granting Defendants’ Motion to Dismiss Plaintiff’s Amended Verified Stockholder Derivative Complaint with prejudice.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendants rely upon the accompanying Memorandum of Law in Support of their Motion to Dismiss Plaintiff’s First Amended Verified

Stockholder Derivative Complaint and the Declaration of Kristina A. Bunting, as well as the exhibits and attachments thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is being submitted herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 78.1(b), the Avis Defendants request oral argument on this motion.

Dated: November 18, 2024

Respectfully submitted,

s/ Samuel I. Portnoy

GIBBONS P.C.

Samuel I. Portnoy
One Gateway Center
Newark, NJ 07102-5310
Tel: (973) 596-4909
Fax: (973) 639-6218
sportnoy@gibbonslaw.com

s/ Audra J. Soloway

**PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP**

Jaren Janghorbani
Audra J. Soloway
Kristina A. Bunting
1285 Avenue of the Americas
New York, NY 10019-6064
Tel: (212) 373-3000
jjanghorbani@paulweiss.com
asoloway@paulweiss.com
kbunting@paulweiss.com

Matthew D. Stachel
1313 N. Market Street, Suite 806
P.O. Box 32
Wilmington, DE 19899-0032
Tel: (302) 655-4410
mstachel@paulweiss.com

Counsel for Defendants Bernardo Hees, Anu Hariharan, Lynn Krominga, Glenn Lurie, Joseph A. Ferraro, and Izilda P. Martins, and Nominal Defendant Avis Budget Group, Inc.